

THE HONORABLE LAUREN KING

UNITED STATES OF DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

LEO'S WELDING and FABRICATION, LLC, a
Washington limited liability company

Plaintiffs,

v.

HANNAH, Official Number 1067457, her
machinery, engines, equipment, cargo
appurtenances, *in rem* and SAYAK
LOGISTICS, LLC, an Alaska limited liability
company dba NORTHLINE SEAFOODS *in*
personam

Defendants.

Case No. 2:25-cv-00625 LK

DECLARATION OF BENJAMIN
BLAKEY

I, BENJAMIN BLAKEY, declare as follows:

1. I am over the age of 18, am competent to be a witness and make the
following declaration based on my personal knowledge. I am a director for Defendant
Sayak Logistics, LLC (hereinafter "Sayak") in the above captioned matter.

2. This declaration is submitted in support of Defendant Sayak Logistics,
LLC's Opposition to Plaintiff's Motion for Arrest and For Appointment of Substitute
Custodian.

1. 3. As a director for Sayak, I oversee the day-to-day operations of the
2. company. I was intimately involved with the acquisition of the HANNAH (hereinafter
3. the “Vessel”) and its conversion into a floating freezer plant. I am further presently
4. directing the construction work being undertaken on the Vessel to get ready for the 2025
5. Bristol Bay salmon season.

6. 4. The Vessel is a large floating barge, 400 feet long and 100 feet wide, and
7. has no motive power of its own.

8. 5. Sayak purchased the Vessel in the Southeastern United States, brought to
9. Bellingham through the Panama Canal, and converted it into a platform for freezing large
10. quantities of salmon.

11. 6. According to its last appraisal, the vessel is worth \$90,000,000.

12. 7. Complex and expensive machinery and equipment have been added to the
13. Vessel, requiring constant monitoring and attention.

14. 8. The Vessel acquisition and conversion work was financed with a \$40
15. million loan that is secured by a ship mortgage on the Vessel, which has priority over the
16. lien claims of Leo’s Welding and Fabrication, LLC (hereinafter “Leo’s) and other unpaid
17. vendors, the mortgage having been filed before their work was performed.

18. 9. The Bristol Bay fishing season starts in late June or early July and is
19. usually completed by late July or early August. The Vessel was designed for use in the
20. annual Bristol Bay salmon season in Alaska, and had its first season in 2024. The Vessel
21. is intended to work nowhere else.

22. 10. Sayak’s business plan is to keep the Vessel in Bellingham when not in
23. Alaska, towing it north before the season, and then towing it back to Bellingham when
24. the season ends.

25. 11. Leo’s participated in the conversion of the Vessel before the 2024 season.

1. 12. The Vessel had a fire on board last summer, which impacted its ability to
2. operate, and some financial reverses were suffered.

3. 13. Leo's was not fully paid, along with other vendors. Sayak has reached
4. accommodations with most vendors except Leo's, and the Vessel is being readied for
5. service in a few months when this year's Bristol Bay salmon season begins. The amount
6. owed to Leo's is in dispute.

7. 14. The timing of the present action and potential arrest implicates Sayak's
8. plans for the Vessel this year, as the Vessel is presently being readied for service and
9. needs to be underway in the next four to six weeks to be ready for the upcoming season.

10. 15. The Vessel is being prepared for the 2025 Bristol Bay salmon season in
11. Alaska and needs to begin its journey north in about one month.

12. 16. Sayak currently has 30 employees and 11 contractors working aboard the
13. Vessel getting ready it for the upcoming Bristol Bay salmon season. Additionally, there
14. are operating and mechanical systems on board requiring constant monitoring and work
15. of skilled personnel to preserve and maintain the Vessel's operating capacity.

16. 17. Any disruption to those preparations poses a very serious risk to the
17. Vessel's equipment and the economic prospects for Sayak and the dozens of employees
18. and contractors whose work depends on the success of the venture.

19. 18. Given the current condition of the Vessel, and its current construction
20. status, the Vessel requires uninterrupted monitoring and maintenance from trained
21. personnel.

22. 19. The Vessel needs a significant skilled staff on board at all times to keep
23. the Vessel's machinery and equipment properly serviced, monitored and maintained.
24. Maintaining a minimum staffing of engineers, technicians, and operators familiar with
25. the status of mid-stream projects, operating procedures, and response protocols is
26.

1. essential and necessary to ensure the safety of the Vessel and those in its vicinity.

2. Properly trained and experienced personnel are essential to this work.

3. 20. As part of those minimum staffing requirements, the following positions
4. are required:

5. a. One chief engineer is required to ensure uninterrupted power is available
6. from generators should shore power become compromised. Disruptions in
7. Vessel power could disrupt the cooling system that is required to maintain
8. gas pressures within safe levels. The Chief Engineer is also capable of
9. executing various emergency response protocols, such as those for fires,
10. floods, or ammonia leaks.

11. b. Two refrigeration operators are required to ensure uninterrupted operation
12. of the Vessel's CO2 cooling system. Prolonged disruption of this system
13. could cause internal gas pressures to exceed tank ratings, creating a
14. serious hazard for both the Vessel itself and neighboring communities.

15. c. Two deckhands are required to monitor tie-up lines which periodically
16. need to be adjusted or replaced in windy conditions.

17. d. One electrician is required to troubleshoot and fix any electrical issues on
18. the refrigeration system, the main switchboard, and the shore power
19. connection.

20. e. Two watchmen are required to monitor the shore power connection,
21. blackwater tank, and any hazards requiring response from trained
22. personnel. If the shore power connection gets snagged on the dock it is
23. very likely to result in a fire, creating a serious hazard for both the Vessel
24. itself and neighboring communities.

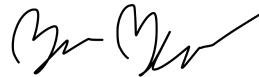
21. There is no time to allow for disruptions or delays aboard the Vessel and still make the 2025 Bristol Bay salmon season. Missing the 2025 Bristol Bay salmon season will be financially catastrophic for Sayak.

22. The Vessel is presently located in Bellingham, Washington, it remains in the possession of Sayak, and is going nowhere for the next several weeks.

23. Sayak is currently planning on employing 96 individuals to work aboard the Vessel during the 2025 Bristol Bay salmon season. Sayak proudly employs individuals from a multitude of cultural and national backgrounds – including individuals who have immigrated to the United States from around the world. For many such individuals, the ability to sleep and eat on the Vessel at no cost allows them to save money for their families. For many, working for Sayak represents the first step on the economic ladder of the United States.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT.

DATED at 3:25 PM _____, Washington this 29th day of April, 2025



Benjamin Blakey

CERTIFICATE OF SERVICE

The undersigned certifies under penalty of perjury of the laws of the State of Washington that, on the 30th day of April 2025, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

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